

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

**IN RE: AQUEOUS FILM-FORMING
FOAMS PRODUCTS LIABILITY
LITIGATION**

MDL No. 2:18-mn-2873-RMG

This Document Relates To All Actions

**JOINT MOTION FOR ENTRY OF CASE MANAGEMENT ORDER GOVERNING THE
FORM, PROCEDURE AND SCHEDULE FOR THE COMPLETION OF A
PLAINTIFF PROFILE FORM**

Co-Lead Counsel for Defendants and Co-Lead Counsel for Plaintiffs (collectively, the “Parties”) jointly move for the entry of Proposed Case Management Order 31. In support of this motion, the Parties state as follows:

1. During the July 19, 2024, Case Management Conference, the Court suggested that the Parties establish a process by which plaintiffs alleging personal injury claims provide a threshold showing of evidence supporting the allegations in their case.
2. The Parties met and conferred extensively regarding this subject and have reached agreement on the terms of a proposed case management order regarding the completion and service of a Plaintiff Profile Form that will serve as a supplement to the existing Personal Injury Plaintiff Fact Sheet.
3. Accordingly, the Parties now submit proposed Case Management Order 31, attached hereto as Exhibit 1, for consideration and entry by the Court.

WHEREFORE, the Parties respectfully request that the Court enter proposed Case Management Order 31, attached as Exhibit 1.

Dated: October 15, 2024

Respectfully submitted,

/s/ Paul J. Napoli

/s/ Michael A. Olsen

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